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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ONE PAINTING ENTITLED “NATURE
14 MORTE AU CRANE DE TAUREAU”
15 BY PABLO PICASSO, ET AL.,

16 Defendants.
17

No. CV 17-4443

[PROPOSED]

WARRANT FOR ARREST IN REM

18 TO: THE FEDERAL BUREAU OF INVESTIGATION (“FBI”), THE
19 UNITED STATES MARSHAL FOR THE CENTRAL DISTRICT OF
20 CALIFORNIA, AND/OR ANY OTHER DULY AUTHORIZED LAW
21 ENFORCEMENT OFFICER:

22 A Verified Complaint for Forfeiture In Rem (“Complaint”) was filed on
23 June 15, 2017, in the United States District Court for the Central District of
24 California by the United States of America, alleging that the defendant assets –
25 specifically, one painting entitled “Nature Morte au Crane de Taureau” by Pablo
26 Picasso; one collage entitled “Redman One” by Jean-Michel Basquiat; and one
27 photograph entitled “Boy with the Toy Hand Grenade” by Diane Arbus (the
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1 “Defendant Assets”) – are subject to forfeiture to the United States of America
2 pursuant to Title 18, United States Code, Section 981(a)(1)(A) and (C).

3 The Court is satisfied that, based upon the allegations of the Verified
4 Complaint, there is probable cause to believe that the Defendant Assets are subject
5 to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

6 YOU ARE HEREBY COMMANDED pursuant to Rule G(3)(c) of the
7 Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture
8 Actions, Federal Rules of Civil Procedure (the “Supplemental Rules”), to arrest
9 and seize the Defendant Assets. Special Agents of the FBI and/or Deputies of the
10 United States Marshals Service (“USMS”), together with any personnel deemed
11 necessary, shall execute this warrant of arrest in rem as soon as practicable.

12 YOU ARE FURTHER COMMANDED to provide a copy of this warrant to
13 the person from whom the Defendant Assets are seized and file a return with this
14 Court identifying the time and details of execution of this Warrant, and the identity
15 of the individual(s) who received copies.

16 THE GOVERNMENT IS COMMANDED to publish notice of the seizure in
17 a manner consistent with the Supplemental Rules, and to provide notice of this
18 action to all persons and entities who reasonably appear to be potential claimants to
19 the Defendant Assets by sending such persons and entities a copy of this warrant
20 and a copy of the Verified Complaint, in a manner consistent with Rule G(4)(b) of
21 the Supplemental Rules.

22 This warrant provides notice that in order to avoid forfeiture of the
23 Defendant Assets, any person claiming an interest in, or right against, the
24 Defendant Assets must file a claim, signed under penalty of perjury, identifying the
25 specific assets claimed, the claimant, and stating the claimant’s interest in the
26 assets in the manner set forth in Rule G(5) of the Supplemental Rules. Any such
27 claim must also be served on Assistant United States Attorney John J. Kucera or
28 Assistant United States Attorney Christen A. Sproule at the United States

1 Attorney's Office, Central District of California, 312 North Spring Street, 14th
2 Floor, Los Angeles, California 90012. In no event may such claim be filed later
3 than 35 days after the date the notice of the Complaint is sent, or if applicable, no
4 later than 60 days after the first day of publication on an official internet
5 government forfeiture site.

6 In addition, any person having filed such a claim must also file an answer to
7 the Verified Complaint not later than 21 days after the filing of the claim, with a
8 copy thereof sent to Assistant United States Attorney John J. Kucera or Assistant
9 United States Attorney Christen A. Sproule at the address above. Upon failure to
10 file a verified statement of interest and answer, default may be entered pursuant to

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1 Rule 55(a), Federal Rule of Civil Procedure, and seizure and condemnation may
2 proceed as sought by plaintiff in its Complaint.

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4 Dated this ____ day of _____, 2017.

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6 UNITED STATES DISTRICT JUDGE

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8 PRESENTED BY:

9 DEBORAH CONNOR, Acting Chief
10 Money Laundering and Asset Recovery Section
11 United States Department of Justice

12 WOO S. LEE

13 KYLE R. FREENY

14 Criminal Division

15 U.S. Department of Justice

16 SANDRA R. BROWN

17 Acting United States Attorney

18 LAWRENCE S. MIDDLETON

19 Assistant United States Attorney

20 Chief, Criminal Division

21 STEVEN R. WELK

22 Assistant United States Attorney

23 Chief, Asset Forfeiture Section

24 /s/Christen A. Sproule

25 JOHN J. KUCERA

26 CHRISTEN A. SPROULE

27 Assistant United States Attorneys

28 Attorneys for Plaintiff

UNITED STATES OF AMERICA